



## JIM GERINGER **GOVERNOR**

## **Department of Environmental Quality**

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ADMINISTRATION	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALIT	Y SOLID & HAZARDOUS WASTE	WATER QUALITY
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February 6, 1998

Mr. Richard Casev Vice President Solvay Soda Ash Joint Venture P.O. Box 1167 Green River, Wyoming 82934

> Response to Comments Permit No.CT-1347

Dear Mr. Casey:

Enclosed is the air quality permit for the Solvay Soda Ash Joint Venture to construct a new process line, known as the "D" train, to increase soda ash production from 2.40 million tons per year to 3.6 million tons per year and revise the allowable emissions on several existing sources at the Green River Plant located in the NE¼ of Section 31, T18N, R109W approximately fifteen (15) miles west of Green River, in Sweetwater County, Wyoming. Per your request, a public hearing was held on January 30, 1998 in the John Wesley Powell Room, Western Wyoming College, Green River, Wyoming. No public comments were received at the public hearing. Your company's comment received on January 29, 1998 was taken into consideration in the final permit.

General Comments: The Division has reviewed the minor corrections to the analysis as submitted by Solvay. The comments are noted and will be incorporated into the permit file. The corrected sums for the dryer kilns have been incorporated into the final permit in Condition 8.

## Condition 12

The intent of this condition is to establish an opacity limit that is a more direct indicator of compliance with the mass emission limit. Per the comments, Solvay agrees with the proposed intent. For a well controlled source with application of BACT, the resulting opacity should be well below the 20% regulatory requirement. The Division recognizes that any correlation of opacity to mass emission limits must be reviewed on a source specific basis and it was with this thought the condition was developed. I believe that through review of concurrent test data and opacity data, with additional operational data through the 6 month period as given in the condition, an opacity limit of less than 20% can be reasonably established. As you are aware, this same condition is part of the OCI permit. As with OCI, Solvay will have the opportunity for input into the process of determining an opacity limit. The Division agrees with Solvay in that a lower limit should be established as part of the condition. Therefore, the condition has been modified to reflect a minimum opacity limit of 7%, consistent with minimum opacity levels established by NSPS requirements.

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If you have any questions regarding this matter, please feel free to contact this office.

Sincerely,

Dan Olson Administrator

Air Quality Division